

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

MICHAEL GERA

Plaintiff

vs.

COUNTY OF SCHUYLKILL

Defendant

No. 3:12-cv-01227-UN3

Judge Richard P. Conaboy

**FILED
SCRANTON**

JUN 10 2013

PLAINTIFF'S MOTION FOR AN EXTENSION OF TIME

PER
DEPUTY CLERK

Plaintiff, Michael Gera hereby move this Court for an Order for an Extension of Time, in which to be allowed to obtain new counsel.

Plaintiff, Michael Gera is seeking an Extension of Time until and including August 12, 2013 which is about (60) days from June 13, 2013 when the current Order, which the Plaintiff believes is the due date for a response.

As grounds for this motion Plaintiff states, because of the mishandling of his case, voluntary withdrawal and now new expenses claimed by his former attorney, has turned many of the attorneys he has contacted off. The time he is asking for will give the few attorneys that are willing to review his case more time to review his documents and give him time to contact more attorneys.

Defendant County of Schuylkill has assented to this motion.

Respectfully submitted:

By: Michael Gera

Michael Gera, Plaintiff
200 S. Spencer Street
Frackville, Pa. 17931
(570) 874 - 0603

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CERTIFICATE OF SERVICE

PER 
DEPUTY CLERK

I hereby certify that on the 10 day of June 2013 a true copy of
PLAINTIFF'S MOTION FOR AN EXTENSION OF TIME was mailed postage prepaid,
to:

Frank L. Tamulonis, Jr., Esquire
Zimmerman, Lieberman, Tamulonis & Hobbs
111 East Market Street
P.O. Box 238
Pottsville, Pa. 17901

Michael Gera

Michael Gera, Plaintiff
200 S. Spencer Street
Frackville, Pa. 17931
(570) 874 - 0603